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8 UNITED STATES BANKRUPTCY COURT
9 EASTERN DISTRICT OF WASHINGTON

10 In re

11 1 MIN LLC; HOTEL AT SOUTHPORT
12 LLC; and TWELFTH FLOOR, LLC,

13 Debtors.
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Chapter 11

Case No. 24-01519 (JOINTLY
ADMINISTERED)

**APPLICATION FOR LEAVE TO
APPEAR PRO HAC VICE
(MATTHEW J. LIVINGSTON)**

16 Pursuant to Local Bankruptcy Rule 9010-1(a)(3) and Local Rule 83.2 of the United
17 States District Court for the Eastern District of Washington, Jeremy E. Roller of the Arete
18 Law Group PLLC, a member in good standing of the Washington State Bar and of the United
19 States District Court for the Eastern District of Washington, hereby moves on behalf of the
20 EB-5 Creditors listed in the *Notice of Appearance of Jeremy E. Roller*, Dkt. No. 47, for the
21 admission *pro hac vice* of MATTHEW J. LIVINGSTON (“Applying Counsel”) in the above
22 captioned case based on the following:

- 23 1. Applying Counsel’s business address, phone number, and email are as follows:

24 Reid & Wise LLC
25 One Penn Plaza, Suite 2015
26 New York, NY 10119
(212) 858-9982
mlivingston@reidwise.com

2. Applying Counsel is admitted to practice law in the following states:

New York – Admitted September 12, 2016, Attorney No. 5456710

3. Applying Counsel is admitted to practice law in the following courts:

United States District Court for the Eastern District of New York

United States District Court for the Southern District of New York

4. Name, address, phone number, and email of admitted counsel with whom the
applicate will be associated (“Local Counsel”) are as follows:

Jeremy E. Roller, WSBA No. 32021

Arete Law Group PLLC

600 University Street, Suite 2420

Seattle, WA 98101

(206) 428-3250

jroller@aretelaw.com

5. Necessity of Appearance: Applying Counsel requests permission to appear *pro hac vice* as Applying Counsel and his firm have represented the EB-5 Creditors, plaintiffs with active litigation against all three debtors in the above-captioned jointly administered cases. Applying Counsel’s experience with the EB-5 Creditors and litigation claims combined with his Chapter 11 experience representing both debtors and creditors will facilitate an efficient representation of the EB-5 Creditors herein.

6. Applying Counsel is not currently subject to any pending disciplinary sanctions nor has he ever been subject to any disciplinary sanctions by any court or bar association.

7. Applying Counsel has read and is familiar with the Local District Court Rules, particularly Local District Court Rule 83.2(c), and understands it is necessary for Local Counsel to sign all pleadings, motions, and other papers prior to filing and service and Local Counsel shall have meaningful participation in the case.

8. Pursuant to Local Bankruptcy Court Rule 9010-1(a)(3) and Local District Court Rule 83.2(c)(2), the required fee has been paid.

1 WHEREFORE Applying Counsel, Matthew J. Livingston, requests this Court enter
2 an order admitting him to practice law before this Court in this case and any related cases,
3 adversary proceedings, and appeals, and to serve as co-counsel with Jeremy E. Roller.
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5 DATED: October 1, 2024
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7 **REID & WISE LLC**

8 By: /s/ Matthew J. Livingston
9 Matthew J. Livingston
10 One Penn Plaza, Suite 2015
11 New York, NY 10119
Phone: (212) 858-9982
mlivingston@reidwise.com

12 *Applying Counsel, Attorney for EB-5*
13 *Creditors*
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ARETE LAW GROUP PLLC

By: /s/ Jeremy E. Roller
Jeremy E. Roller, WSBA No. 32021
600 University Street, Suite 2420
Seattle, WA 98101
Phone: (206) 428-3250
Fax: (206) 428-3251
jroller@aretelaw.com

Local Counsel, Attorney for EB-5
Creditors